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16 *Attorneys for Plaintiffs and the Proposed Class*

17 ***[LIST OF ADDITIONAL COUNSEL ON SIGNATURE PAGE]***

18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA

20 *In re: Hyundai and Kia Engine Litigation,*

8:17-cv-00838-JLS-JDE

Related Cases:

8:17-cv-01365-JLS-JDE

8:17-cv-02208-JLS-JDE

2:18-cv-05255-JLS-JDE

8:18-cv-00622-JLS-JDE

8:18-cv-02223-JLS-JDE

**SUPPLEMENT TO MOTION
FOR FINAL APPROVAL OF
CLASS SETTLEMENT AND
MOTION FOR CLASS
COUNSEL FEE AND EXPENSE
AWARD AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

Date: November 13, 2020

Time: 10:30 a.m.

Hon. Josephine L. Staton

Courtroom: 10A

1 Plaintiffs submit this filing to update the Court on two issues relevant to the
2 final approval hearing scheduled for November 13, 2020.

3 First, Plaintiffs submit the Supplemental Declaration of Adam Gonnelli and the
4 Supplemental Expert Report of Susan K. Thompson, which relate to Plaintiffs Motion
5 for Final Approval of Class Settlement. The Gonnelli Declaration includes updated
6 claims statistics from HMA and KMA. Ms. Thompson's Supplemental Expert Report
7 (attached hereto as Exhibit 1) includes updated calculations with the most recent claim
8 information provided by HMA and KMA, as well as an update on the number of Class
9 Vehicles that have received the KSDS.

10 Second, since Plaintiffs filed their Unopposed Motion for Class Counsel Fee
11 and Expense Award and Class Representative Service Awards, Class Counsel has
12 incurred additional time and expenses. Those times and expenses are detailed in the
13 accompanying Declarations of Matthew D. Schelkopf, Bonner C. Walsh, Adam
14 Gonnelli, and Steve W. Berman, which are being filed contemporaneously herewith.
15 In addition, detailed billing records related to this supplemental time will be submitted
16 to chambers in Microsoft Excel format shortly after this filing.

17 From September 26, 2020 to November 5, 2020, Class Counsel have spent
18 approximately 508 hours working on this case, for an additional lodestar amount of
19 \$280,599. When combined with the previously submitted totals, this increases the
20 overall lodestar amount to \$3,820,403.87. In addition, Class Counsel expended
21 \$28,135.20 in additional costs, increasing the total amount of costs incurred to
22 \$150,153.70. When compared against the \$6,900,000 fee request, Class Counsel's
23 total lodestar of \$3,820,403.87 reflects a lodestar multiplier of 1.81.

24 Dated: November 6, 2020

Respectfully submitted,

25 By: /s/ Matthew D. Schelkopf

26 Joseph G. Sauder

Matthew D. Schelkopf

27 Joseph B. Kenney

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CERTIFICATE OF SERVICE

I, Matthew D. Schelkopf, hereby certify that on this 6th day of November, 2020, I caused the foregoing to be filed using the Court's CM/ECF system, and thereby electronically served it upon all registered ECF users in this case.

By: /s/ Matthew D. Schelkopf
Matthew D. Schelkopf